

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

BARBARA A. PLANCK,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: <b>2:06-CV-543-MHT-SRW</b>
	)	
DONALD H. RUMSFELD, Secretary,	)	
Department of Defense, et al.,	)	
	)	
Defendant.	)	

**MOTION TO STAY**

Comes now the undersigned, by and through Leura G. Canary, United States Attorney, and respectfully requests that all deadlines in this matter, including the June 29, 2007, dispositive motion deadline, be stayed and as grounds states as follows:

The defendant and the plaintiff have been engaged in productive negotiations which will most likely result in the execution of a settlement agreement between the parties. While completed, all necessary paperwork has not yet been reviewed and signed by all necessary parties. It is anticipated that same will be accomplished within the next two weeks.

Counsel for the defendant has contacted the plaintiff and she does not oppose this request.

WHEREFORE, premises considered it is respectfully requested that this matter and all deadlines be stayed

Respectfully submitted this 29<sup>th</sup> day of June, 2007.

LEURA G. CANARY  
United States Attorney

By: s/R. Randolph Neeley  
R. RANDOLPH NEELEY  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 29, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and I hereby certify that I have mailed, by United States Postal Service, a copy of same to the following non-CM/ECF participant(s):

Barbara A. Planck, pro se  
1119 County Road 513  
Midland City, AL 36350

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s/R. Randolph Neeley  
Assistant United States Attorney